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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PROTON ASSOCIATES LLC, and
SETH MILLER,

Plaintiffs,

v.

AVELO, INC.,

Defendant.

Case No. 2:25-cv-00856-JCM-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR DEFENDANT
TO RESPOND TO THE COMPLAINT**

(First Request)

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule IA 6-1, Plaintiffs Proton Associates LLC and Seth Miller (together, “Plaintiffs” or “Miller”), and Defendant Avelo, Inc. (“Defendant” or “Avelo”), hereby agree and stipulate to extend the time for Avelo to file and serve its response to the Complaint, filed on May 16, 2025, the response to which is currently due on Wednesday, June 11, 2025, and in support of such, state the following:

1. The Complaint in this action was filed on May 16, 2025 (ECF No. 1) and Avelo was served with the Summons and Complaint on May 21, 2025 (ECF No. 7).

2. Avelo has recently retained its undersigned litigation counsel who, in light of their existing obligations to other clients, as well as their professional, and personal schedules, require additional time to investigate the factual and legal bases for the Complaint and to prepare and file a response to the Complaint.

3. Accordingly, Avelo’s counsel has requested, and Plaintiffs’ counsel has agreed, to a one-week extension of time for Avelo to file and serve its response to the Complaint, from Wednesday, June 11, 2025 to Wednesday, June 18, 2025.

4. This is the parties' first request to extend the deadline for Avelo to file and serve its response to the Complaint. The parties make this stipulation in good faith, to promote the just, speedy, and inexpensive determination of this action, and not for purposes of undue delay.

IT IS SO AGREED AND STIPULATED:

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By: /s/ Jonathan W. Fountain

By: /s/ Daniel Bravo

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Proton Associates LLC and Seth Miller

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: June 6, 2025